

Section 106 & CEQA

Presentation at the California Tahoe Conservancy
South Lake Tahoe

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*The Office
Of
Historic
Preservation*

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Office of Historic Preservation

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The Office of Historic Preservation (OHP) is responsible for administration of federally and state mandated historic preservation programs in California. The mission of the Office of Historic Preservation and the State Historical Resources Commission, in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.

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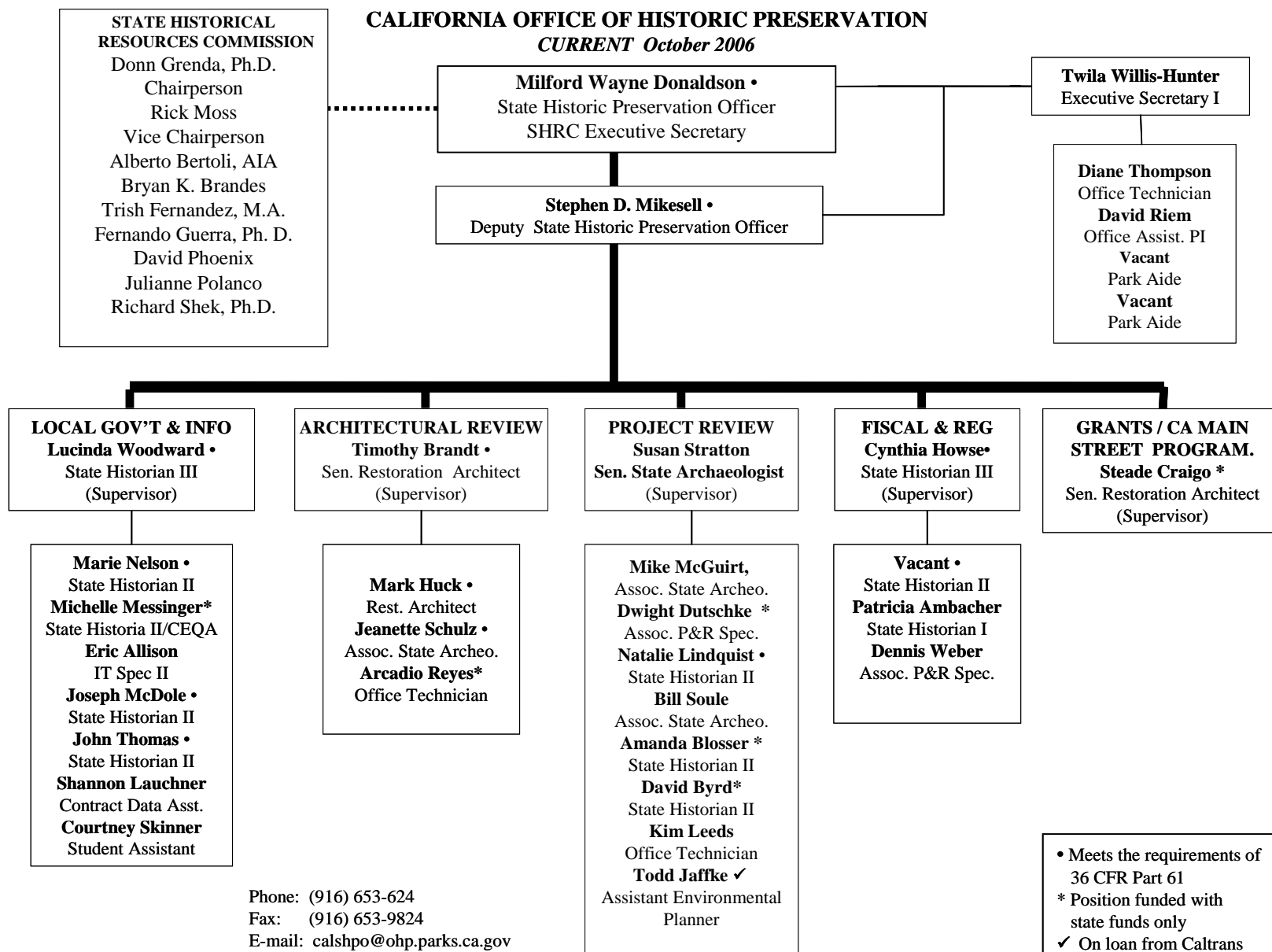
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- [Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines \(amended\)](#)
- [Federal Historic Preservation Tax Incentives](#)
- [National Register Bulletins](#)

The Office of Historic Preservation





Project Review – Federal Agency Contacts

Amanda	Bill	Dave	Dwight	Mike	Natalie
710	BIA	USA	710	COE	FAA
FEMA	BUR	USAF	BLM	FERC	FCC
FTA	DPR's LWCF and RTP grant submittals	USMC	USFS (second)	FHWA	FHWA (second)
GSA	EPA	USN		Military (second)	USCG
NPS	FTA (second)	USDA Rural Development			USPS
Presidio Trust	Western Area Power Administration	USFS			

These represent the Federal agencies that regularly submit projects for Section 106 review or who have frequent contact with the Project Review unit staff. SHPO receives consultation packages from approximately 80 Federal agencies.



Section 106 – The Review Process



The Section 106 Process

- *Initiate Consultation with the SHPO §800.3*
 - *Establish the Undertaking*
- *Identification of Historic Properties §800.4*
 - *Determine the Area of Potential Effects §800.16(d)*
 - *Evaluate historic significance, e.g., apply National Register criteria*
 - *Determine eligibility*
- *Assessment of Adverse Effects §800.5*
- *Resolution of Adverse Effects §800.6*
 - *MOA/PA*

APE Consultation



APE
consultation
defines the
field of play

Elements of an APE Submittal

- Description of elements of undertaking's implementation that may affect historic properties
- Precise description and map of APE
- Concise description of how APE takes undertaking's implementation into account
- Concise discussion of stakeholder opinions

Part 800 Identification Phase Consultation

36 CFR § 800.4(a)

- (2) **Review existing information** on historic properties within the area of potential effects ... ;
- (3) **Seek information ... from consulting parties ...** likely to have knowledge of, or concerns with, historic properties in the area ... ; and
- (4) **Gather information from .. Indian tribe[s] ...** to assist in identifying properties ... which may be of religious and cultural significance to them.

Part 800 Identification Phase Consultation

36 CFR § 800.4(b)

Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe ... that might attach religious and cultural significance to properties within the area of potential effects, **the agency official shall take the steps necessary to identify historic properties within the area of potential effects.**

The “Industry Standards” Approach to Historic Property Identification

- *Record Search*
- *Pedestrian Survey*

The Section 106 Process

- *Initiate Consultation with the SHPO §800.3*
 - *Establish the Undertaking*
- *Identification of Historic Properties §800.4*
 - *Determine the Area of Potential Effects §800.16(d)*
 - *Evaluate historic significance, e.g., apply National Register criteria*
 - *Determine eligibility*
- *Assessment of Adverse Effects §800.5*
- *Resolution of Adverse Effects §800.6*
 - *MOA/PA*

The California SHPO's Approach to Evaluation Phase Consultation (Part 1)

- Gather the minimum amount of data necessary to make a National Register determination
- If the undertaking will not affect archaeological sites that happen to be in the APE, then consider assuming National Register eligibility
- When an undertaking may affect an archaeological site, start evaluation phase fieldwork on the portion of the site where the undertaking's effects are likely to occur

The California SHPO's Approach to Evaluation Phase Consultation (Part 2)

- Develop a research design that explicitly links hypotheses with anticipated field data
- Support archaeological deposit interpretations and evaluations with explicit arguments that refer to actual field data
- Minimize damage to properties undergoing evaluation
- Consider doing enough fieldwork on National Register eligible properties to inform effects determinations and the development of treatment plans

Part 800 Effects Assessment Consultation

The Federal agency is done with Section 106 consultation under 36 CFR § 800.4(d)(1) if

- (1) there are no historic properties in the APE,
- (2) there are historic properties in the APE but the undertaking's implementation won't impact them, or
- (3) the undertaking's implementation will impact an historic property but the impact does not constitute an "effect" as defined in Part 800.

The Section 106 Process

- *Initiate Consultation with the SHPO §800.3*
 - *Establish the Undertaking*
- *Identification of Historic Properties §800.4*
 - *Determine the Area of Potential Effects §800.16(d)*
 - *Evaluate historic significance, e.g., apply National Register criteria*
 - *Determine eligibility*
- *Assessment of Adverse Effects §800.5*
- *Resolution of Adverse Effects §800.6*
 - *MOA/PA*



PRC 5024

•Review of State-owned Historical Resources

- SHPO will maintain a master list of state-owned historical resources
- 5024(f) - State agency will seek the SHPO comments on any project having the potential to affect historical resources.
- While these sections of the PRC apply to structures, many state agencies use this code section to seek the SHPOs comments on a variety of historical resources including archeological resources.



- Weaverville Joss House (1874)



PRC 5024.5

•Review of State-owned Historical Resources

- Provide 30 day notice before altering, transferring, relocating, or demolishing an historical resource
- When the SHPO determines that there will be an adverse effect, the SHPO and the state agency will adopt prudent and feasible measures
- Office of Planning and Research (OPR) will provide mediation when there is a refusal to adopt prudent and feasible measures



CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA & OHP

OHP's Role

- Is the State's recognized authority on Preservation and Historical and Cultural Resources
- By definition a Commenting Agency under CEQA
- OHP receives in excess of 14,000 CEQA documents annually from SHC

- OHP comments under PRC 5024 & PRC 5024.5 on State Projects
- OHP comments on Local Government projects: City, County, Special Districts
- Commenting Criteria
- Has no state mandate/authority; therefore only one paid position for CEQA review exists

Brief re-cap of CEQA:

- Enacted in 1970, modeled after NEPA
- Law was created to require public agencies decision makers to **document & consider** the environmental implications of their actions
- Applies to **all** governmental agencies at **all** levels in California

CEQA Act

- Authority is codified in Statute §§ 21000-21177, California Public Resources Code
- CEQA Guidelines written by Office of Planning and Research (OPR) 14 Cal. Code Regs. § 15000 et. seq.; the last revision occurred in 1998.
- Biennial Review of Guidelines required by OPR; proposed changes to be recommended to Secretary of the Resources Agency § 21087

Purpose of CEQA

- **Protection of the Environment**
- Was enacted in response to the well-documented failure of state and local governments to consider fully the environmental implications of their actions
- CEQA is to be interpreted liberally “to afford the fullest possible protection of the environment within the reasonable scope of the statutory language” (*Friends of Mammoth v. Board of Supervisors*)

Four general principles

- 1. **Information** : Inform decision makers & public about significant environmental effects of proposed activities
- 2. **Identification**: Identify ways that environmental damage can be avoided or significantly reduced

- 3. **Prevention:** Prevent significant, avoidable damage to the environment by requiring changes in projects through use of alternatives or mitigation measures when the agency finds changes to be feasible
- 4. **Disclosure:** Disclose to the public the reasons why an agency approved the project in the manner the agency chose if significant environmental effects are involved (Code § 21001 (d); Guidelines §15002)

CEQA applies to **Discretionary** projects

A Project is: any activity which
may cause either a direct or
indirect physical change in the
environment

CEQA has a

- **Substantive** Mandate. It is not just procedural.
- Public agencies **must** deny approval of projects with significant environmental effects if “there are feasible alternatives or mitigations measures” that can substantially lessen or avoid those effects

Categorical Exemptions

- Are classes of projects that should be exempt from CEQA review (PRC 21080(b)(9); 21084)
- Resources Agency has determined that these generally do not have a significant effect on the environment, unless an **exception** to the exemption exists

Exception Rule for Historical Resources

Categorical Exemption **shall not be used** when a project will cause substantial adverse changes in the significance of an historical resource

But: Historical Resource Categorical Exemption §15331

Allows for historical resource
restoration or rehabilitation when
consistent with the Secretary of
Interior's Standards and Guidelines

The EIR

- Considered the “heart and soul” of CEQA
- Its practical purpose is to inform about project impacts, analyze ways to minimize significant effects, evaluate feasible alternatives
- CEQA achieves its purpose of long-term protection of the environment by functioning as “an environmental full disclosure statute, and the EIR is the method of disclosure”

Purpose of Initial Study (IS)

- Preliminary analysis by lead agency, with other agencies, to determine whether an EIR or MND is needed
- If IS concludes that the project without mitigation may have a significant effect on environment, an EIR should be prepared (otherwise, prepare ND or MND) §15063.

Fair Argument Standard

- Creates very “low” threshold for an EIR preparation
- *An EIR must be prepared when the Lead Agency determines that it can be fairly argued, based on substantial evidence, in light of the whole record, that a project may have a significant effect on the environment. (PRS 21080(d); 21082(d))*

In General: MITIGATION & Historical Resources

A lead agency **must** identify any potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource

Any adopted mitigation measures **must** be made fully enforceable through permits, conditions, agreements, or other measures (CEQA Guidelines § 15064.5 (b) (3-5))

AUTHORITY TO MITIGATE

- PUBLIC AGENCY HAS AUTHORITY TO REQUIRE FEASIBLE CHANGES IN ANY OR ALL ACTIVITIES TO LESSEN OR AVOID SIGNIFICANT EFFECTS ON THE ENVIRONMENT(CEQA GUIDELINES §15041)

Feasibility Definition

- Public Resources Code section 21061.1:

“**Feasible**” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

In General:

For **each** significant impact identified in the EIR, feasible measures to **avoid or substantially reduce** the project's environmental effect **must be discussed** (CEQA Guidelines §15126.4(a))

What is Adequate Mitigation??

- Adequate means

specific, feasible **actions** that will actually **improve** adverse environmental conditions, by avoidance, by minimizing, by rectifying, or reducing/eliminating effects

Inadequate Mitigation measures

- Improper identification of resources
- Further studies/survey of area
- Partial salvation of building elements & donating these to a group/organization
- Relocation of buildings to form an artificial district
- HABS/HAER recordation or other level of recordation for a demolition if intended to be below level of significance

Further inadequate mitigation:

- Installation of plaque for a demolition
- Creation of a panel or other mini exhibit as compensatory mitigation for a demolition

Mitigation May Not Be Deferred !!

Mitigation MAY NOT BE
DEFERRED TO SOME FUTURE
TIME....

Historical Resource Mitigation measures that fulfill CEQA's condition of “improvement”

Resource avoidance through project or site change

- Adaptive re-use of a building or site
- Can be a relocation (adequate photo and other documentation should occur)
- Incorporation of resource into project

Mitigation that can work...

depending on each specific case

- Compensatory mitigation; monies paid into a fund or used for specific purpose, surveys or NR nomination
- Photo and other documentation including oral histories
- Partial avoidance
- Partial incorporation of site/resource

Relocation

- The confusion:
- It can be an Impact
 - Or
- It can be Mitigation

More specific: What is the appropriate mitigation for a potential adverse effect to an archeological resource?

- **Preservation**
- Preservation in place is the preferred treatment of an archeological resource in CEQA

Examples of preservation techniques in CEQA:

1. Planning construction to avoid archeological site
2. Deeding archeological site into permanent conservation easement
3. Capping the archeological site with chemically stable soil
4. Incorporation of archeological site within an open space

Data recovery

- When preservation in place of an archeological resource is not feasible, data recovery is the appropriate mitigation
- “a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resources, shall be prepared and adopted prior to any excavation being undertaken” (CEQA 15126.4 (b)(3)(C))

What is data recovery?

- Data recovery is the documentation, recordation, and removal of the archeological deposit from its discovery site in a manner consistent with professional standards
- And the subsequent cataloguing, analysis, identification, dating, interpretation & production of a report of findings



Data Recovery: Comparison between CEQA & Section 106

CEQA

- Data recovery is an appropriate preservation method
- Data recovery can permit avoidance of adverse effect

Section 106

- Data recovery is an appropriate preservation method
- Data recovery is inherently destructive, thus, is an adverse effect

Final Archeology Reports

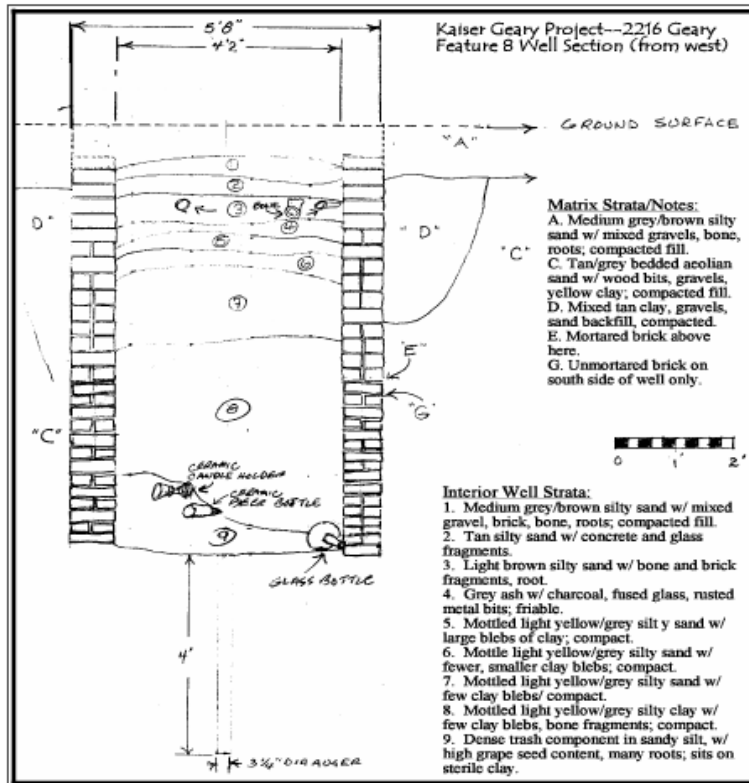


Figure 14: 2216 Geary Street, Feature 8, portion of field drawing, 15 August 1997.

- Copies of final archeology reports should be filed at the appropriate California Historical Resources Regional Information Center

Curation

- Curation is an appropriate mitigation
- The curation facility should meet OHP standards
- What should be curated?
 - Artifacts, ecofacts
 - Associated documentation (field notes, catalogues, drawings, photographs, videography, final reports)



What is adequate mitigation?

- Expected resource \neq accidental discovery mitigation
- Expected resource \neq archeological monitoring mitigation
 - If location of resource can be identified before construction
 - If construction can damage resource and soils context of resource
- Expected resource = archeological monitoring mitigation
 - If testing is not feasible or sufficiently predictive/informative
- Expected resource = archeological testing mitigation

Human Remains

- If **Native American** human remains are probable
 - Contact **Native American Heritage Commission**

- If human remains accidentally discovered
 - Contact **county coroner**
 - If coroner determines remains Native American, coroner contacts NAHC within 24 hrs
 - NAHC contacts **most likely descendant** (MLD)
 - If MLD does not respond in 24 hrs, Native American human remains must be reburied **on project site** in location not subject to future disturbance

More on Mitigation: CEQA and Alternatives

- A draft EIR must describe a **reasonable range of feasible alternatives** to the project **or** project location that could **feasibly attain** most of the basic project objectives and would **avoid or substantially lessen any** of the significant environmental impacts of the proposed project.

Two – Part Test of CEQA process:

- Lead Agency has to determine whether there is a **significant impact** to an historic resource by a project

Question 1: is resource “historically significant”

Question 2: would project cause a “substantial adverse change” in its significance

But: there are really **3** Key questions pertaining to Historical Resources

- 1. proper **Identification**: Is there a historical resource?
- 2. clear determination :Would the project **cause a substantial adverse change** in the significance of the resource?
- 3. And : Can the impact be **avoided or mitigated**?, i.e. Secretary of Interior Standards or otherwise, i.e. (relocation)?

Appendix G

Environmental Checklist Form Cultural Resources for the Initial Study

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?
- b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5
- d) Disturb any human remains, including those interred outside formal cemeteries?

CEQA's Definition of an Historical Resource:

- In general : Historical resources are recognized as part of the environment under CEQA
- Definition very broad, very inclusive
- Includes Archeological and Cultural Resources
 - **Public Resources Code 21084.1 and CEQA Guidelines § 15064.5**

CEQA's Benchmark:

The California Register of
Historical Resources

California Register Criteria are association with either

- Events
- Patterns of Events
- Repeated Activities
- Historic Trends

(Criterion 1)

- **OR**

Significant Persons

(Criterion 2)

- Embodies distinctive characteristics of a type, represents the work of a master, possesses high artistic values

(Criterion 3)

Or

Has yielded or has the potential to yield important information

(Criterion 4)

Resources Types are

- **Buildings**, such as houses, hotels, garages, schools, stables, theaters, churches, mills, post offices, etc.
- **Structures**, such as canals, fences, silos, tunnels, bridges, boats, dams, grain elevators, light houses, kilns, etc.

Or

Sites:

A site is a location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structures.

Site examples are:

Battlefields, trails, village sites, designed landscapes, shipwrecks, petroglyph, natural features that have a cultural significance, cultural landscapes, etc

OR

- **Districts.**

A district possesses significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

Discontiguous districts can have definable significant areas separated by non-significant areas

What is Integrity?

Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of **significance**.

The (7) Seven aspects of integrity: Location, Design, Setting, Materials, Feeling, Workmanship, Association

What is the **Historic Context**?

- Resources or Occurrences in history are part of a larger context, pattern, or succession
- Local, State or National or together
- Thematic examples: art, industry, military, education, science, ethnic, commerce, entertainment, agricultural; etc.

So, now **Section §15064.5**

Says this:

(a) For purposes of this section, the term “historical resources” shall include the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission (SHRC), for listing in the California Register of Historical Resources.

California Register

- Includes:
 - direct listing by the SHRC;
 - properties listed in the National Register of Historic Places;
 - determined eligible for inclusion in the NR by the Keeper of the NR;
 - determined eligible for inclusion in the NR through the Section 106 process;

California Register

- Also includes:
 - determined eligible for inclusion in the NR through the Part 1 of the federal historic preservation tax credit process;
 - California Historical Landmarks beginning with #770; and
 - California Points of Historical Interest and CHL prior to #770 may be on California Register upon action by State Historical Resources Commission

(a) For purposes of this section, the term “historical resources” shall include the following:

- (2) A resource included in a **local register** of historical resources. . . . or identified as significant in an historical resources **survey** shall be **presumed** to be historically or culturally significant. **Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.**

Local Designation

- “Local register of historical resources” means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution

Surveys

- A resource identified as significant in an historical resources **survey** may be listed in the California Register if the survey meets all of the following criteria:
 - (1) The survey has been or will be included in the State Historic Resources Inventory
 - (2) The survey and the survey documentation were prepared in accordance with office procedures and requirements.
 - (3) The resource is evaluated and determined by the office to have a significance rating of Category 1 to 5 on DPR Form 523.

Surveys

- What about surveys that are over 5 years of age?



- The reference in the CEQA Guidelines is confusing.
 - » If a survey is **nominated** to the California Register it must be updated if it is more than 5 years old.

Surveys

- **However. . .**
- This does **not** mean that resources identified in an older survey need not be considered “historical resources” for purposes of CEQA.
- Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the California Register.

(a) For purposes of this section, the term “historical resources” shall include the following:

- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources.

(a) For purposes of this section, the term “historical resources” shall include the following:

- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of historical resources, not included in a local register of historical resources, or identified in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource. . . .

How does CEQA define archeological resources?

- CEQA discusses two types of archeological resources:
 - a “**unique** archaeological resource”
 - an archeological resource that qualifies as a “**historical resource**”



What is a “unique archaeological resource”?

An archeological resource that:

- 1) contains information needed to answer important scientific research questions
- 2) has a special and particular quality such as being the oldest of its type
- 3) is directly associated with a prehistoric or historic event or person

What is an archeological resource that is an “historical resource”?

An archeological resource that is:

- 1) listed or determined eligible for listing on the California Register of Historical Resources
- 2) listed in a “local register of historical resources”
- 3) listed in an “historical resource survey”

How is an archeological resource determined to be an historical resource?

Generally an archeological resource is determined to be an historical resource due to its eligibility for listing to the California Register because of its scientific information value or Criterion D

“Has yielded, or may be likely to yield information important in prehistory and history”

Can an archeological resource be eligible to the CRHR under Criterion other than D?

- Yes. An archeological resource can be eligible to the CRHR under Criterion
 - A association with events that have made a significant contribution to the broad patterns of history
 - B association with the lives of historically important persons
 - C association with the characteristics of type, period, region, or method of construction

How to assess whether an archeological resource can yield information important in prehistory and history

- Archaeological Resource Management Reports. OHP. 1989
- Guidelines for Archaeological Research Designs. OHP. 1991
- Reports components should include:
 - Objectives
 - Study area or Area of Potential Effect (APE)
 - Prehistoric & historic setting
 - Research design
 - Description of methodology for field investigation
 - Curation arrangements

Integrity

integrity = “retains physical characteristics that convey its historical significance” (§ 15064.5 (b))

integrity for archeological resource = (generally) resource sufficiently intact to yield the expected important information

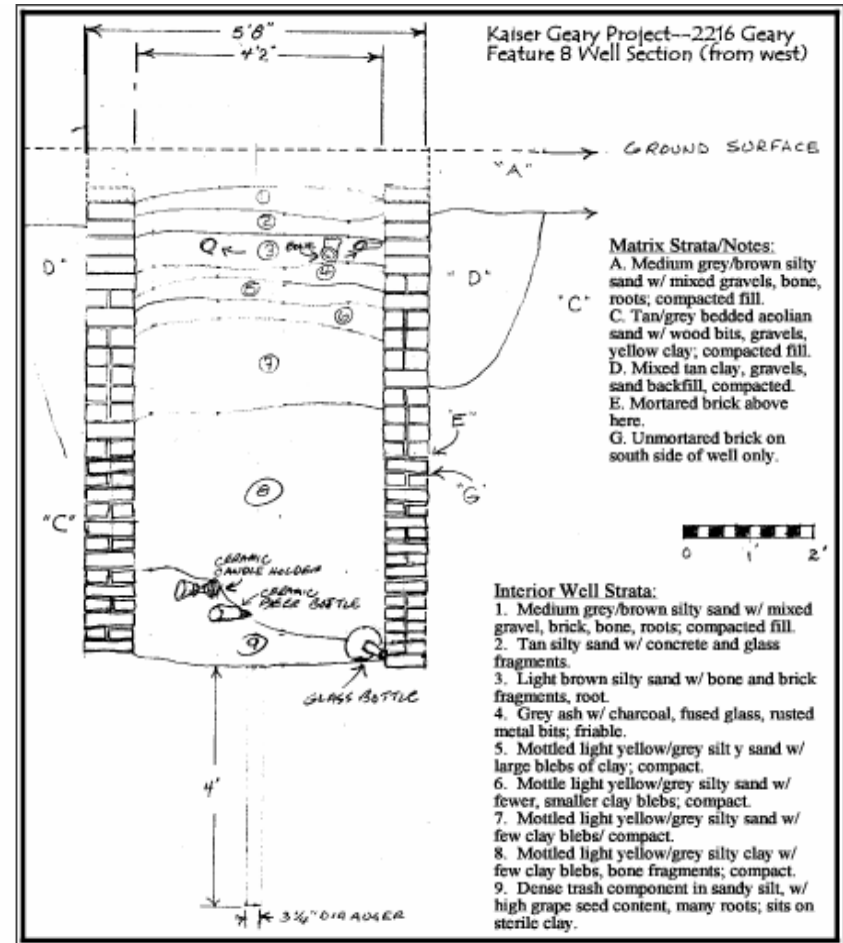


Figure 14: 2216 Geary Street, Feature 8, portion of field drawing, 15 August 1997.

What is the relationship between a unique and historical resource?

“When a project will impact an archaeological site, a lead agency shall **first** determine whether the site is an historical resource”

(§ 15064.5 (c)(1))



What are adequate efforts to identify an archeological resource?

- Record search at Information Center
- Archival research (historic maps, building, assessor & water connection records, city directories, U.S. Census population, industrial, institutional, agricultural schedules, historic photographs)
- Sacred lands search at NAHC, Native American and descendent group contacts
- Geotechnical & soil characterization studies
- Archeological field survey
- Archeological testing program (presence/absence, identification, evaluation)

What is a significant adverse effect to an archeological resource?

- The “significance” of the resource must be “materially impaired”
- “materially impaired” = “demolishes or materially alters in an adverse manner those physical characteristics ...that convey its historical significance that justify its inclusion in” the CRHR or local register of historical resources
- Generally, for archeological resources,

Significant adverse effect = destruction of scientific data

CEQA defines substantial adverse change of an historical resource as:

**Physical Demolition,
Destruction, Relocation, or
Alteration of the resource or its
immediate surroundings such
that the significance of the
historical resource would be
materially impaired.**

Demolition



Alteration



BEFORE

After



Alteration of immediate surroundings



Section (§15064.5(b)(1-2)(A-C)says:

The **Significance** of a historical resource is **materially impaired** when a project:
demolishes or materially alters in an **adverse manner** those physical characteristics of an historical resource that convey its **historical significance** **and** that justify its **inclusion in, or eligibility for inclusion in**

- 1. the California Register
- 2. Local Register
- 3. Or its identification in a survey, unless the public agency reviewing the effects of the project establishes the preponderance of evidence that the resource is not historically or culturally significant
- AND

- 4. demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California register as determined by a lead agency for purposes of CEQA
(§15064.5(b)(1-2)(A-C))

How can a substantial adverse change in an historical resource be avoided?



Pursuant to CEQA

§15064.5 (3)

- (3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

The “Standards”

- are the **general principles** that govern the work on historical resources and

Apply to Historic Properties of

All:

Types, Sizes, Uses, Styles &
Periods, Materials

Apply to Exteriors & Interiors

And **Include:**

Buildings, Sites, Landscape
Features,

Environment, and attached,
adjacent or related new
construction

A successful Rehabilitation Treatment



The Four Treatments are:

PRESERVATION
REHABILITATION
RESTORATION
RECONSTRUCTION

Importance of Choosing the Appropriate Treatment

- Relative importance in history
- Physical condition
- Proposed use
- Mandated code requirements

Treatments

- **Reconstruction:**

“.... depicting, by means of new construction, the form, features, and detailing of a non-surviving” property

- **Preservation:**

“The act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. . .”

Treatments

- **Restoration:**

“ . . .accurately depicting the form, features, and character of a property as it appeared at a particular time. . . .”

- **Rehabilitation:**

“ . . .making possible a compatible use for a property through repair, alternations, and additions while preserving those portions or features which convey its historical values.”

Office of Historic Preservation

www.ohp.parks.ca.gov

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